

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

**John Phillipson individually and  
on behalf of all others similarly situated**

**Plaintiff,**

v.

**Jacob Collection Group, LLC and  
Security Credit Services, LLC**

**Defendant.**

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) **No. 11-4032 (ADS) (AKT)**  
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**NOTICE OF MOTION**

Please take notice that the Plaintiff in this matter on the basis of the supporting papers accompanying this notice shall move this Court for an Order Striking the Defendants' Affirmative Defenses based on "Bona Fide Error."

Dated: West Islip, NY  
October 22, 2011

THE PLAINTIFF

Joseph Mauro, Esq.  
The Law Office of Joseph Mauro, LLC  
306 McCall Ave.  
West Islip, NY 11795  
(631) 669-0921

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**PLAINTIFF'S MOTION TO STRIKE**

Plaintiff moves the Court to Strike the Defendants' Affirmative Defenses based on "Bona Fide Error."

Dated: October 22, 2011  
West Islip, NY

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